

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 1:21-cv-00285-JL
	)	
	)	
JOHN J. FLATLEY d/b/a JOHN J. FLATLEY	)	
COMPANY and LUKE PAGE,	)	
	)	
Defendants.	)	
_____	)	

ASSENTED-TO MOTION TO ENTER PROTECTIVE ORDER

Pursuant to Local Rule 26.2 of the United States District Court for the District of New Hampshire, the United States requests that this Court enter the proposed protective order governing the confidentiality of material produced during discovery (“Proposed Protective Order”) attached hereto as Exhibit A. In support of this motion, the United States states as follows:

1. The attached Proposed Protective Order conforms with Civil Form No. 5 pursuant to Local Rule 26.2, with the following exceptions: complainants Natasha Grant and Farhad Pourkamali Anaraki are added to Paragraph 5.b as persons to whom confidential discovery materials may be disclosed because damages are sought in this action on their behalf and many of the discovery materials being sought by defendants include confidential medical records of complainant Natasha Grant. Additionally, due to their practice of keeping digital copies of records, not hard copies, counsel for defendants have requested and the United States has assented to change Paragraph 5.c to require the retention of digital copies of the forms signed by persons acknowledging their obligations, as opposed to requiring the retention of original hard copies.

2. The defendants assent to the relief requested in this motion.
3. Due to the nature of this motion, no memorandum of law is required.

For the reasons stated, the United States requests that this Court enter a Protective Order according to the terms of the Proposed Protective Order.

Respectfully submitted,

JOHN J. FARLEY  
Acting United States Attorney

By: /s/ Raphael Katz  
Raphael Katz  
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Dated: August 18, 2021

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of August 2021, I served a copy of this assented-to motion to enter protective order on all parties of record in this action, via ECF.

/s/ Raphael Katz  
Raphael Katz, AUSA